

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and HTA.

**ORDER GRANTING FOUR HUNDRED EIGHTH OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO SATISFIED CLAIMS**

Upon the *Four Hundred Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Puerto Rico Highways and Transportation Authority to Satisfied Claims* [ECF No. 19545] (the “Four Hundred Eighth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Finaancing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Eighth Omnibus Objection.

December 17, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Eighth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Eighth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Eighth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Eighth Omnibus Objection (collectively, the “Satisfied Claims”) have been satisfied; and the Court having determined that the relief sought in the Four Hundred Eighth Omnibus Objection is in the best interests of the Commonwealth, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Eighth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Four Hundred Eighth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Eighth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Satisfied Claims on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 19545 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Eighth Omnibus Objection

Four Hundred Eighth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	C E & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR00960	5/7/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	12273	Undetermined*
Reason: Proof of Claim asserts liability on the basis of Invoice Nos. IN00512132 and IN00512169. The records of the Department of State show IN00512132 has been fully satisfied, pursuant to EFT# 00234171 dated 09/10/2018. Invoice IN00512169 was asserted in the proof of claim in an amount of \$2,674.00. But, the invoice provided to the Department of State stated the amount as \$2,082.65. \$2,082.65 is the amount that the Department of State paid for invoice IN00512169, pursuant to EFT# 00234171 dated 09/10/2018.						
2	CANO RODRIGUEZ, SUCN EFRAIN A COND EL MONTE NORTE 165 AVE HOSTOS APT630 SAN JUAN, PR 00918	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	34333	\$ 9,900.00
Reason: Proof of Claim asserts liability on the basis of Invoice Nos. 07/01/2017, 08/01/2017, 09/01/2017, 10/01/2017, 11/01/2017, 12/01/2017, 01/01/2018, 02/01/2018, 03/01/2018, 04/01/2018, 05/01/2018 and 06/01/2018. The records of the State Elections Commission show such invoices have been fully satisfied, pursuant to EFT Nos. 00280407, 00280406, 00203251, 00203250, 00203249, 00203248, 00203247, 00284098, 00284097, 00284096, 00284095 and 00284094 dated 06/08/2021, 06/08/2021, 08/07/2020, 08/07/2020, 08/07/2020, 08/07/2020, 08/07/2020, 06/18/2021, 06/18/2021, 06/18/2021, 06/18/2021 and 06/18/2021 respectively.						
3	CARLOS M FLORES LABAULT DBA C.E. & L.F. P.O BOX 3092 BAYAMON, PR00960-0000	5/7/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	12286	Undetermined*
Reason: Proof of Claim asserts liability on the basis of Invoice No. IN00515087. The records of the Telecommunications Regulatory Board show the invoice has been fully satisfied, pursuant to EFT# 00063181 dated 02/02/2018.						
4	CARLOS M. FLORES LABAULT DBA CE & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR00960	5/7/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	12138	Undetermined*
Reason: Proof of Claim asserts liability on the basis of Invoice No. IN00506809. The records of the Planning Board show the invoice has been fully satisfied, pursuant to Check# 17C00006 dated 09/04/2016.						
5	DE LOS A MENDEZ, SUCN MARIA REPTO OLIVERAS 21 SATURNO CABO ROJO, PR 00623	5/16/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	19566	\$ 12,870.00
Reason: Proof of Claim asserts liability on the basis of Invoice Nos. 6302017, 7312017, 8312017, 9302017, 10312017, 11302017, 12312017, 1312018, 2282018, 3312018, 4302018, 5302018 and 6302018. The records of the State Elections Commission show such invoices have been fully satisfied pursuant to EFT Nos. 00041680, 00197890, 00197891, 00201636, 00201635, 00201766, 00201765, 00201764, 00272462, 00272458, 00272459, 00272460 and 00272461 dated 06/28/17, 07/17/2020, 07/17/2020, 08/06/2020, 08/06/2020, 08/06/2020, 08/06/2020, 08/06/2020, 05/17/2021, 05/17/2021, 05/17/2021 and 05/17/2021 respectively.						
6	FISA, S.E. PO BOX 2286 GUAYAMA, PR00785-2286	5/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27599	\$ 80,042.63
Reason: Invoices totaling \$80,042.63 were paid via EFT 00078919 and 00083837 on 5/18/2018 and 06/13/2018.						

Four Hundred Eighth Omnibus Objection
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	NUSTREAM COMMUNICATIONS INC. HECTOR FIGUEROA VINCENTY ESQ CALLE SAN FRANCISCO 310 STE. 32 SAN JUAN, PR 00901	4/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	8725	\$ 130.00
Reason: Proof of Claim asserts liability on the basis of Invoice No. 9034. The records of the Controller's Office show the invoice has been fully satisfied, pursuant to EFT# TB26A0013 dated 04/26/2018.						
8	OSUNA RUIZ, MILAGROS URB SANTA PAULA COLINAS93 GUAYNABO, PR 00969	5/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	20550	\$ 28,215.00
Reason: Proof of Claim asserts liability on the basis of Invoice Nos. 07/01/2017, 08/01/2017, 09/01/2017, 10/01/2017, 11/01/2017, 12/01/2017, 01/01/2018, 02/01/2018, 03/01/2018, 04/01/2018, 05/01/2018 and 06/01/2018. The records of the State Elections Commission show such invoices have been fully satisfied, pursuant to EFT Nos. 00209106, 00209107, 00204804, 00204803, 00204847, 00204849, 00204850, 00272821, 00273170, 00273169, 00273168 and 00273167 dated 08/31/2020, 08/31/2020, 08/13/2020, 08/13/2020, 08/13/2020, 08/13/2020, 08/13/2020, 05/17/2021, 05/17/2021, 05/17/2021, 05/17/2021 and 05/17/2021 respectively.						
9	PLAZA LAS AMERICAS, INC. G. CARLO-ALTIERI LAW OFFICES 254 CALLE SAN JOSE, THIRD FLOOR SAN JUAN, PR 00901	6/6/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	39992	\$ 7,205,220.53*
Reason: Proof of Claim asserts settlement agreement between HTA and creditor. HTA deposited funds with the Commonwealth court in compliance with the agreement, and the creditor fully withdrew those funds on October 4, 2021.						
10	SANTOS ORTIZ, MIGDALIA 21 LUIS LUGO URB FERNANDEZ CIDRA, PR 00739	6/5/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	51334	\$ 9,990.00
Reason: Proof of Claim asserts liability on the basis of Invoice Nos. 07/01/2017, 08/01/2017, 09/01/2017, 10/01/2017, 11/01/2017, 12/01/2017, 01/01/2018, 02/01/2018, 03/01/2018 and 04/01/2018. The records of the State Elections Commission show such invoices have been fully satisfied, pursuant to EFT Nos. 00198310, 00198309, 00204820, 00204811, 00204808, 00204809, 00204810, 00273164, 00283984 and 00303448 dated 07/20/2020, 07/20/2020, 08/13/2020, 08/13/2020, 08/13/2020, 08/13/2020, 08/13/2020, 05/17/2021, 06/18/2021 and 08/27/2021 respectively.						
TOTAL						\$ 7,346,368.16*